



**North Carolina
Wildlife
Federation**

*Affiliated with the National Wildlife
Federation*
www.ncwf.org

To: Mr. Rich Gannon, Mr. Jason Robinson, DENR-Division of Water Quality Planning
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Re: Jordan Lake Comments

Submitted: via electronic transmittal on July 25, 2007

The North Carolina Wildlife Federation (NCWF) supports the major goals of a set of proposed rules to control nutrient inputs to B. Everett Jordan Reservoir. NCWF supports rules to reduce nitrogen and phosphorous from *all* sources that contribute to Jordan Lake, including development, agriculture, and wastewater effluent.

Nearly one million people live in the Jordan Lake watershed. It is simply a wonderful place to live and therefore, developing at a rapid pace. Most of us would agree that it is the excellent quality of life that draws residents into this area; however, the quality of life is largely dependent upon the State's management of environmental and natural resources.

NCWF supports proactive measures to protect this aquatic habitat before it is too late. Jordan Lake and many streams that feed it have been listed on the Federal "Impaired Waters" list. The State took the first step in identifying a need to implement a TMDL in 1997. A five-year extension was granted to conduct a study which showed that the upstream municipalities were responsible for many of the pollution problems in Jordan Lake. We cannot afford any further delays; therefore sound science must be used to implement a much needed pollution reduction strategy rather than postponing an inevitable and necessary implementation date. Recreational fishing is a very important economic driver for the region. Also as Chlorophyll A levels climb, the lake is more prone to fish kills and algae blooms and produces conditions that lead to an unhealthy balance of all fish and aquatic species.

Therefore, we must require that wastewater treatment plants upstream from the lake reduce nutrients (both phosphorus and nitrogen) by 2011. NCWF also supports NC DENR's decision to require stormwater retrofits to help offset nutrient impacts to Lake Jordan. NCWF does not support the proposed 2016 extension. The longer that we wait,

the more costly it will be to implement solutions, including financial and environmental expense.

The proposed rules are very vague about what local governments must do to control pollution from existing development. The science is clear that Jordan Lake cannot become healthy again unless we tackle this source of pollution. We are urging the NC Environmental Management Commission to be specific about what local governments must do to begin controlling runoff from existing development.

In addition to natural resource improvements, clean water planning can improve a community's recreational opportunities, aesthetic appeal, and economic growth. Communities that plan carefully for their future and conserve their important resources are better able to attract the businesses and jobs that improve the local economy and that create quality communities.

In closing, the NCWF strongly urges the EMC to take clear and prompt action and adopt strong rules to protect and enhance water quality at Jordan Lake.

Respectfully submitted,

Larry Thompson
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